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Attorneys for Defendant Taasera Licensing LLC

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PALO ALTO NETWORKS, INC.,

Plaintiff,

v.

TAASERA LICENSING LLC and QUEST PATENT RESEARCH CORPORATION,

Defendants.

Case No. 1:22-cv-02306-ER/SDA

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Taasera Licensing LLC's Motion to Dismiss Palo Alto Networks, Inc.'s ("Palo Alto" or "Plaintiff") First Amended Complaint (D.I. 21) for Declaratory Judgment of Non-Infringement and all prior pleadings and proceedings had herein, Defendant Taasera Licensing LLC hereby moves this Court, at a time and date determined by the Court, for an order (i) pursuant to 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure (a) granting dismissal of Plaintiff Palo Alto Networks, Inc. First Amended Complaint (D.I. 21) for Declaratory Judgment of Non-Infringement relative to Defendant Taasera Licensing LLC in its entirety, and (b) a determination of no alter ego exists between defendants Taasera Licensing LLC and Quest Patent Research Corporation, and

(ii) granting such other and further relief as the Court deems just and proper.

Dated: Rye, New York May 31, 2021

Respectfully submitted,

FABRICANT LLP

By: /s/ Alfred R. Fabricant
Alfred R. Fabricant

Attorneys for Defendant Taasera Licensing LLC

TO: Counsel for Defendant (by ECF)